

**UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT**

LOUISIANA MUNICIPAL POLICE
EMPLOYEES' RETIREMENT SYSTEM, *et*
al.,

Plaintiffs,

vs.

GREEN MOUNTAIN COFFEE ROASTERS,
INC., *et al.*

Defendants.

Case No. 2:11-CV-00289-WKS

**STIPULATED MOTION FOR FILING OF AN AMENDED COMPLAINT AND
DEFENDANTS' RESPONSES THERETO**

Pursuant to Local Rule 7(a), for the reasons recited below, the parties to the above-captioned actions jointly request that the Court order the schedule set forth below, and have stipulated to such schedule pursuant to Local Rule 7(a)(7):

WHEREAS, on November 29, 2011, plaintiff Louisiana Municipal Police Employees' Retirement System ("LAMPERS") filed a class action complaint, against Green Mountain Coffee Roasters, Inc., Lawrence J. Blanford, Frances G. Rathke, Robert P. Stiller, Barbara D. Carlini, William D. Davis, Jules A. del Vecchio, Hinda Miller, David E. Moran, Michael J. Mardy, Merrill Lynch, Pierce, Fenner & Smith Incorporated, Canaccord Genuity Inc., Piper Jaffray & Co., Janney Montgomery Scott LLC, RBC Capital Markets, LLC, Rabo Securities USA, Inc., Santander Investment Securities Inc., SunTrust Robinson Humphrey, Inc., Wells Fargo Securities, LLC, and William Blair & Company, L.L.C. (collectively, "Defendants"), alleging violations of the Securities Exchange Act of 1934 and the Securities Act of 1933;

WHEREAS, on April 27, 2012, this Court appointed as lead plaintiffs LAMPERS, Sjunde AP-Fonden, the Board of Trustees of the City of Fort Lauderdale General Employees'

Retirements System, Employees' Retirement System of the Government of the Virgin Islands, and Public Employees' Retirement System of Mississippi, and appointed as lead plaintiffs' counsel the firms of Kessler Topaz Meltzer & Check, LLP, Bernstein Litowitz Berger & Grossman LLP, and Barrack, Rodos & Bacine;

WHEREAS, undersigned counsel for the Defendants are authorized to and hereby accept and waive service of summons on behalf of each of the foregoing Defendants;

NOW, THEREFORE, the parties, through their undersigned attorneys and subject to this Court's approval, stipulate and agree to the following:

1. The Defendants are not required to answer or respond to the initial complaint filed by LAMPERS on November 29, 2011.
2. Within sixty (60) days of the Court's approval of this stipulation, lead plaintiffs shall file and serve an amended complaint.
3. Defendants shall move, answer or otherwise respond to the amended complaint within sixty (60) days after the filing of the amended complaint.
4. If Defendants move to dismiss the consolidated amended complaint, lead plaintiffs shall file and serve their opposition within forty-five (45) days after the filing of any motions to dismiss.
5. If Defendants move to dismiss the amended complaint and lead plaintiffs file an opposition to such a motion, Defendants shall file and serve their reply to any opposition made by lead plaintiffs within thirty (30) days after the filing of lead plaintiffs' opposition.
6. This Stipulation is without prejudice to any and all rights or defenses that the parties have under law, including any and all jurisdictional defenses.

IT IS SO STIPULATED:

*Counsel for Defendant Green Mountain Coffee
Roasters, Inc.*

/s/ Matthew S. Borick

Robert B. Luce
Matthew S. Borick
DOWNS RACHLIN MARTIN PLLC
Courthouse Plaza
199 Main Street
P.O. Box 190
Burlington, VT 05402-0190
Telephone: 802-863-2375
Facsimile: 802-862-7512
bluce@drm.com
mborick@drm.com

Randall W. Bodner
Anne Johnson Palmer
Michael J. Vito
ROPES & GRAY LLP
Prudential Tower
800 Boylston Street
Boston, MA 02199-3600
Telephone: (617) 951-7878
Facsimile: (617) 235-0569
randall.bodner@ropesgray.com
anne.johnsonpalmer@ropesgray.com
michael.vito@ropesgray.com

*Counsel for Defendants Lawrence J. Blanford,
Frances G. Rathke, Robert P. Stiller, Barbara D.
Carlini, William D. Davis, Jules A. del Vecchio,
Hinda Miller, David E. Moran, and Michael J.
Mardy*

/s/ Robert B. Hemley

Robert B. Hemley
Matthew B. Byrne
GRAVEL AND SHEA
76 St. Paul Street, 7th Floor
P. O. Box 369
Burlington, VT 05402-0369
rhemley@gravelshea.com

Counsel for Lead Plaintiffs

/s/ John Browne

John Browne
Laura Gundersheim
BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP
1285 Avenue of the Americas, 38th Floor
New York, New York 10019
Telephone: (212) 554-1400
Facsimile: (212) 554-1444
johnb@blbglaw.com
laurag@blbglaw.com

John Kehoe
John Gross
KESSLER TOPAZ MELTZER
& CHECK, LLP
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056
jkehoe@ktmc.com
jgross@ktmc.com

Daniel E. Bacine
Mark R. Rosen
Lisa M. Lamb
BARRACK, RODOS & BACINE
Two Commerce Square
2001 Market Street, Suite 3300
Philadelphia, PA 19103
Telephone: (215) 963-0600
Facsimile: (215) 963-0838
dbacine@barrack.com
mrosen@barrack.com
llamb@barrack.com

*Counsel for the Global Institutional
Investor Group and Proposed Co-Lead
Counsel for the Class*

mbyrne@gravelshea.com
Telephone: (802) 658-0220
Facsimile: (802) 658-1456

Counsel for Merrill Lynch, Pierce, Fenner & Smith Incorporated, Canaccord Genuity Inc., Piper Jaffray & Co., Janney Montgomery Scott LLC, RBC Capital Markets, LLC, Rabo Securities USA, Inc., Santander Investment Securities Inc., SunTrust Robinson Humphrey, Inc., Wells Fargo Securities, LLC, and William Blair & Company, L.L.C.

/s/ Karen McAndrew

Karen McAndrew
DINSE, KNAPP & McANDREW, P.C.
209 Battery Street
Burlington, VT, 05402-0988
Telephone: (802) 864-5751
Facsimile: (802) 862-6409
kmcandrew@dinse.com

Adam S. Hakki
Jaculin Aaron
Jeffrey Resetarits
(admitted pro hac vice)
SHEARMAN & STERLING LLP
599 Lexington Avenue
New York, NY 10022
Telephone: (212) 848-4000
Facsimile: (212) 848-7179
adam.hakki@shearman.com
jaaron@shearman.com
jeffrey.resetarits@shearman.com

Dated: July 11, 2012

IT IS SO ORDERED:

William K. Sessions, III
U.S. District Court Judge

/s/ Robin A. Freeman, Jr.
Robin A. Freeman, Jr.
LYNN, LYNN & BLACKMAN, P.C.
76 St. Paul Street, Suite 400
Burlington, VT 05401
Telephone: (802) 860-1500
Facsimile: (802) 860-1580
rfreeman@lynnlawvt.com

Proposed Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2012, I electronically filed with the Clerk of Court the foregoing document using the CM/ECF system. The CM/ECF system will provide service of such filing via Notice of Electronic Filing (NEF) to the following NEF counsel:

Jaculin Aaron, Esq.
Mary K. Blasy, Esq.
Michael D. Blatchley, Esq.
Deborah Clark-Weintraub, Esq.
Robin A. Freeman, Esq.
Adam S. Hakki, Esq.
Mary P. Kehoe, Esq.
Karen McAndrew, Esq.
Phyllis M. Parker, Esq.
Barbara A. Podell, Esq.
Jeffrey J. Resetarits, Esq.
Mark R. Rosen, Esq.
Sherri R. Savett, Esq.
William B. Skiff, II

/s/ Matthew S. Borick
Matthew S. Borick

13493694.1